

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

MARK MONDRAGON o/b/o,
D.M. a minor child

Plaintiff,
v.
1:21-cv-00427-MV-KRS

RIO RANCHO PUBLIC SCHOOLS,
BOARD OF EDUCATION and
GEORGE ARCHULETA in his
individual capacity,

Defendants.

**DEFENDANT RRPS' ANSWERS AND RESPONSES TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES, REQUESTS FOR PRODUCTION AND REQUESTS FOR
ADMISSION TO DEFENDANT RIO RANCHO PUBLIC SCHOOLS,
BOARD OF EDUCATION**

COMES NOW Defendant Rio Rancho Public Schools, Board of Education, (hereinafter "RRPS") by and through counsel, Jerry A. Walz, Walz and Associates, P.C., hereby submits its Answers and Responses to Plaintiff's First Set of Interrogatories, Requests for Production and Requests for Admission to Defendant RRPS.

EXHIBIT I

INTERROGATORY NO. 17: Please identify by date, party name(s) and any other identifying information, any previous or subsequent complaints, allegations, and/or investigations initiated by Rio Rancho Public Schools, or any another agency related to George Archuleta.

ANSWER:

No complaints were made nor investigations conducted regarding George Archuleta during his employment with Rio Ranch Public Schools.